

## Marketing Code of Conduct Policy

**Scope:** This policy applies to the following AG Barr business divisions :

Barr Soft Drinks	FUNKIN Cocktails	MOMA Foods
✓	✓	✓

### INTRODUCTION

A G Barr markets some of the UK's best known soft drinks brands in addition to FUNKIN, the UK's favourite cocktail brand and MOMA, the Craft Oat company. Our brands are enjoyed by millions of people throughout the country and those people rightfully expect the highest of standards not only in the quality of our products, but also in how we market them.

This policy has been written to provide the framework for our marketing communication and to ensure that the responsibility that we demand from ourselves and that our consumers expect from us is fully reflected in everything we do.

### RESPONSIBILITY & MANAGEMENT

This policy is owned by the Commercial Director and responsibility for compliance is with the Barr Soft Drinks Marketing Director.

All internal consumer marketing teams, trade marketing teams and customer teams must be briefed on the policy, together with all external partners and agencies who either develop or deploy communications on our behalf.

The policy will be reviewed periodically (at a minimum on an annual basis) to ensure that it is in line with all relevant regulation and with our overall Responsibility objectives.

### SCOPE

The policy is applicable to all A G Barr owned brands, including FUNKIN Cocktails and MOMA Foods. It also covers partnership brands for which we are responsible in the UK and other specified geographies in Europe.

The policy applies to all types of marketing communications including, but not limited to, brand advertising, brand promotion, brand PR, brand packaging, brand sponsorship, brand digital/social media content, influencer marketing, brand sampling and brand point of sale material.

### CORE PRINCIPLES

1. All activities will work to both the letter and the spirit of regulatory framework and where applicable, of industry codes.

2. Our brands, for example IRN-BRU, do at times seek to challenge and surprise. However we will never set out to offend or go beyond the realms of what generally would be seen as good taste.
3. We will not use language or present imagery that is seen as derogatory or offensive to any particular groups of people, including but not limited to as might be defined by gender, ethnicity, religion or sexual orientation.
4. Furthermore we will seek to be fully inclusive within our marketing communications, ensuring that they represent the diversity of our consumers.
5. We will not seek to encourage or promote excessive consumption of any of our drinks or to encourage an unhealthy lifestyle.
6. We recognise that our soft drinks can and will be consumed by children. We recognise that we have a particular responsibility here and will not target directly under 12's with communication from any of our drinks, nor under 16's with any High Fat Sugar Salt (HFSS) products.
7. Our soft drinks are consumed with alcohol or in environments where alcohol is present. In the case of FUNKIN, our products are designed to be served with alcohol and can now be bought pre-mixed with alcohol. Any marketing activity associated with alcohol must support the principle of responsible drinking.
8. We recognise that we have a responsibility to our environment and this is reflected in our sustainability strategy. In our marketing we will work towards increasing awareness of recyclability of materials and encourage greater recycling. We will ensure that we have effective recycling and waste arrangements in place for our sampling and experiential activity.

## **POLICY DETAIL**

1. All marketing communications will comply with relevant UK regulation and legislation. Specifically:
  - a. all our communications will work within the framework of the The UK Code of Broadcast Advertising (BCAP Code), the UK Code of Non-broadcast Advertising and Direct & Promotional Marketing (CAP Code) and the Consumer Protection for Unfair Trading Regulations 2008 (CPRs).
  - b. for FUNKIN Cocktails, our products are designed to be served with alcohol and include ready to drink pre-mixed alcoholic beverages. All communications will comply with The Portman Group Codes of Practice which govern the packaging and promotion of alcohol in the UK
2. We will apply the UK's Voluntary Front of Pack Nutrition Labelling Scheme, as set out by The Food Standards Agency, across the majority of our owned soft drinks brands in the UK. In the case of FUNKIN alcoholic beverages, we will promote the Chief Medical Officer's (CMO's) low risk drinking guidelines on all 'ready to drink' packaging, as well as featuring Drink Responsibly. [Drinkaware.co.uk](http://Drinkaware.co.uk) for the facts.
3. We will adhere to the Industry Code of Practice on Energy Drinks, as laid out by the British Soft Drinks Association (BSDA).
4. We will not market any of our products directly to children under 12, irrespective of the nutritional content of those products. This includes avoidance of use of licensed characters or celebrity/movie/music associations where appeal is primarily to under 12's.

5. We will not market High Fat Sugar Salt (HFSS) products directly to children under 16, as laid out in the BCAP code and we will apply this to marketing communications in all other channels. HFSS definition is defined by the current Department of Health Nutrient Profiling Model.
6. We will seek to ensure that our advertising and content production are managed in a sustainable way.

**Last Reviewed :** April 2024

**Last Updated :** April 2024